

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOHN M. NOLAN, JR.	:	CIVIL ACTION NO. 02-CV-2805
Plaintiff,	:	
	:	
v.	:	
	:	
READING BLUE MOUNTAIN & NORTHERN RAILROAD CO.	:	
Defendant.	:	TRIAL BY JURY DEMANDED

**INITIAL DISCLOSURES OF DEFENDANT,
READING, BLUE MOUNTAIN & NORTHERN RAILROAD COMPANY, INC.**

Pursuant to F.R.C.P. 26 (a)(1), Defendant, Reading, Blue Mountain and Northern Railroad make the following disclosures:

1. The following employees of Defendant have knowledge of the facts set forth in Defendant's Answer to Complaint with Affirmative Defenses:
 - A. Tyler Glass;
 - B. Heather Davidheiser;
 - C. Therman Maderia; and
 - D. Phillip Geschwindt.
2. Each of the names persons may be contacted through counsel for Defendant.

Respectfully Submitted,

Paul R. Ober, Esquire
Attorney for Defendant
Reading, Blue Mountain
and Northern